



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Kelly Dixon, Director
Land Protection Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: Request for Review and Support of the Source Control Record of Decision for the Wilcox Oil Company Superfund Site

Dear Ms. Dixon:

The U.S. Environmental Protection Agency (EPA) requests your review and support of the selected remedy identified in the Source Control Record of Decision (ROD) for the Wilcox Oil Company Superfund Site, Bristow, Oklahoma.

The rationale for the selected remedy is explained in the draft Source Control ROD for the Wilcox Oil Company Superfund Site, which has been provided electronically to Oklahoma Department of Environmental Quality staff. The EPA Remedial Project Manager, Ms. Katrina Higgins-Coltrain, has corresponded with her State counterpart, Mr. Todd Downham, by phone and via e-mail to provide appropriate materials and to obtain input related to identifying an acceptable source control remedial response action.

This action is limited in scope to addressing tank and lead additive area source material through excavation, treatment, and offsite disposal. By taking this source control action, significant human health and ecological risk reduction will be accomplished through the removal of primary sources located throughout the site at or near the soil surface, specifically residential properties. In addition, further migration and environmental degradation of adjacent waterways (e.g., Sand Creek and the East Tributary), wetlands, and stream riparian areas is mitigated. Because this action does not constitute the final remedy for the site, subsequent actions to address fully the threats posed by conditions at this site will be documented in a future final site decision document.

The selected remedy includes excavation, treatment, and offsite disposal of approximately 30,362 y³ at an estimated cost of \$4,135,294. Approximately 28,093 y³ of tank waste source material will be excavated and disposed of offsite while approximately 2269 y³ of lead additive area material will be treated and disposed of offsite. Excavated

areas will be backfilled with clean soil from an offsite location and re-vegetated. All excavated areas will be graded for drainage and appropriate erosion controls implemented.

Currently, the Wilcox Oil Company Superfund Site is in the remedial investigation and feasibility study phase of the Superfund Process. Although final site investigation and risk assessments have not been completed, taking appropriate source control actions at sites during the investigation stage of the process is consistent with the National Contingency Plan (NCP) and existing EPA guidance. The NCP [40 CFR § 300.430(a)(1)] states, "Remedial actions are to be implemented as soon as site data and information make it possible to do so." Site investigation will be ongoing concurrent with the implementation of this remedial response.

We appreciate the Oklahoma Department of Environmental Quality's cooperation and coordination in addressing the cleanup issues associated with this site. As always, EPA appreciates the dedication of your staff in assisting us to achieve our overall goal of protecting human health and the environment. Should you have additional questions or concerns regarding the site, please contact the Remedial Project Manager, Ms. Katrina Higgins-Coltrain by electronic mail at coltrain.katrina@epa.gov or by phone at (214) 665-8143. Please contact the site attorney, Mr. Marvin Benton by electronic mail at benton.marvin@epa.gov or by phone at (214) 665-3190 with any legal questions.

Sincerely,

Carl E. Edlund, P.E.,
Director
Superfund Division